

Exhibit 11

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

CIVIL ACTION NO: 14-CV-0029

v.

National Football League and
NFL Properties, LLC
Successors-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO
ALL ACTIONS

DECLARATION OF EDWARD J. RADETICH, JR.

I, Edward J. Radetich Jr., being first duly sworn according to law, declare as follows:

1. I am a Partner in Heffler Claims Group ("Heffler"), the offices of which are at 1515 Market Street, Suite 1700, Philadelphia, Pennsylvania, 19102. Heffler was hired to assist Class Counsel and provide certain services in the above referenced litigation.

2. Heffler has been providing administration services, including call center support for over 40 years. We have successfully provided administration services for more than 900 class actions. See Exhibit A attached for company profile.

3. Heffler was specifically responsible for two aspects of the notice plan, and worked collaboratively with other firms in this process. First, in consultation with Class Counsel, Heffler took the below-described actions to establish a dedicated toll-free number, IVR and live operator telephone service for the *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323. Second, Heffler was responsible for mailings of notice packages after the initial direct notice package was sent by Smith Edwards Dunlap ("SED") to the Class Members on July 24, 2014. This included handling returned items, as well as processing subsequent requests for notice packages that were submitted to Heffler or to Brown Greer

4. Heffler established two dedicated toll-free numbers (855-887-3485, 855-997-3485) for the *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323.

5. On July 10, 2014, Heffler placed a temporary recording on those numbers stating that a full range of information and options would be made available on July 17, 2014. Additionally it directed callers to the NFL Concussion website. The recorded script is attached hereto as Exhibit B.

6. On July 15, 2014, Heffler conducted a training session for operators who would be handling incoming live telephone calls. Each operator was provided with a training manual which included a background of the litigation, a review of the settlement agreement, a detailed discussion of the proposed frequently asked questions, and a demonstration of the database to be used to record claimant information. The training prepared operators on how to respond to Frequently Asked Questions.

7. On July 17, 2014 at 8 a.m., Heffler launched the IVR system. The IVR system includes a brief introduction to the case, a main menu with 14 Frequently Asked Questions from which a caller may select, and the option to speak to a live

dedicated customer service representative from 8 a.m. to 8 p.m. EST Monday through Friday. The IVR script is attached hereto as Exhibit C.

8. On July 17, 2014, Heffler manned the live operator portion of the call center. During this time, Heffler had 10 operators available to respond to calls. A database capturing each caller's name, address, and the reason for the call is maintained for each call received. This information was cross referenced with the Master Mailing List that was maintained by Brown Greer to ensure that all contact information was up to date and accurate. Any changes to contact information were made to the Master Mailing List on a weekly basis. Finally, to ensure that callers received accurate and clear information, calls were also recorded and periodically monitored by call center supervisors.

9. Heffler reported weekly to Class Counsel in regards to call center statistics. The call statistics through and including October 14, 2014 are summarized as follows:

- a. 4,544 callers have accessed the IVR system;
- b. The cumulative time spent on the IVR system was 265 hours, 24 minutes, and 41 seconds;
- c. 2,302 callers have requested to speak to a live operator from 8 am to 8 pm EST Monday through Friday;
- d. The cumulative time spent with live operators was 140 hours 7 minutes.

10. Additionally, persons who called could request that they receive additional information, including information about eventual registration for the settlement when it is approved. As of October 14, 2014, 1800 persons signed up to receive future information. This information was and continues to be provided to Brown Greer on an on-going basis.

11. In addition to establishing and maintaining a call center, Heffler was also responsible for the handling and mailing of notices and settlement agreements. These included the notices sent to all counsel of record, as well as mailings to potential class members as a result of: 1) requests by a potential class member via the call center, 2) Notice packets returned as undeliverable, from the initial mailing to potential class members performed by SED.

12. As of October 14, 2014, Heffler has received a total of 4,774 undeliverable Notice packets from the SED mailings. A total of 453 of these were returned by the United States Postal Service with forwarding addresses and were re-mailed to those Class Members via postage prepaid, First-Class Mail. A total of 4,321 Notice packets were returned as undeliverable without a forwarding address. Heffler performed address traces on 4,252 of the Notice packets returned as undeliverable with no forwarding addresses. (A total of 69 Notices were returned with no address or name to search therefore no trace was performed.) The address traces utilized the Class Member's name, previous address and/or other identifying information in an attempt to locate a current address. Of the address traces performed, updated addresses were obtained and appropriate Notice packets were re-mailed to 972 potential Class Members via postage prepaid, First-Class Mail. Thus, as of October 14, 2014 there are 3,280 Notice packets remaining as undeliverable. No additional effort is being made to find new addresses.

13. As of October 14, 2014, Heffler has received 164 requests for Notices and/or Settlement Agreements from the call center. These packages were mailed to those Class Members via postage prepaid, First Class Mail.

14. As of October 14, 2014, Heffler has received 336 requests for Notices and/or Settlement Agreements from attorneys representing clients or from Brown Greer directly. These packages were sent to those attorneys or class members via FedEx overnight or via postage prepaid, First Class Mail depending on the request.

I declare under penalty of perjury under the laws of the State of Pennsylvania and the United States that the above is true and correct to the best of my knowledge and that this Affidavit was executed on November 11, 2014, in Philadelphia, Pennsylvania.



Edward J. Radetich Jr.

Exhibit A



Heffler Claims
Group

CURRICULUM VITAE



1515 Market Street, Suite 1700 • Philadelphia, PA 19102 • 215.665.8870 • Fax 215.665.0613

California | New Jersey | New York | Oklahoma | Oregon

www.HefflerClaims.com



COMPANY PROFILE

Heffler Claims Group (Heffler) is the pioneering administrator in the class action field, with more than forty years' experience in the management and administration of some of the most complex settlements in the country. Beginning in the 1960s, Heffler initiated class action claims administration and mass tort claims management and created many of the methods and procedures used by most administrators today. Heffler was responsible for developing the first electronic claim form and was the first administrator to use "postcard checks" for distribution, eliminating the need for envelopes and thereby saving the class money on both printing and postage.

Heffler has successfully managed and disbursed settlement funds in more than 900 cases, including some of the largest settlements of all time. We have paid claimants billions of dollars in settlement funds and distributed several hundred million notices. In one settlement alone, Heffler paid out over \$3 billion. In another high-profile settlement, we sent nearly 40 million notices and processed more than 10 million claims.

Through our continued investment in both people and innovation, Heffler remains one of the most experienced administrators in practice today. We have expertise in all aspects of administration for antitrust, securities, employment, mass tort, consumer and government enforcement matters, but we also offer what other administrators lack – *personal service on each and every case from a leadership team that consists of the most experienced professionals in the industry.*

Our world-class team is comprised of JDs, CPAs, forensic CPAs and MBAs who have decades of practical experience. This unique blend of in-house expertise allows us to efficiently scale for cases of every type, size and scope. We offer our clients comprehensive services including consultation with former class action and mass tort practitioners, to assist with the settlement process and documentation at the initial stages of your case; and monitoring and tracking of counsel hours and expenses in complex and multi-party cases by certified accountants, to facilitate applications to the Court.

Each case is managed by a partner and a senior project manager to ensure our consultative process results in meeting and hopefully exceeding our clients' expectations. We are independently owned and operated, which allows our leadership team to focus on what matters most – *You, our client.*

Unlike some administrators, Heffler eliminates the need to retain outside financial, tax, audit or accounting services.



Our affiliate company, Heffler, Radetich & Saitta LLP, is a full-service certified public accounting company comprised of auditors and forensic accountants who have the unique ability to advise counsel regarding audit procedures and complicated distribution algorithms to accept claims, drafting plans of allocation, confirming the validity of claims and distributing the funds. Additionally, our tax professionals monitor the tax impact of transactions under IRC section 468(B).

HF Media LLC, our in-house media company, provides media, market and consumer research, media planning, graphic design, broadcast production, media buying, program evaluation and reporting and expert testimony. Led by Jeanne Finegan, APR, HF Media consults with clients to provide notice strategy and evaluate media options to determine the most impactful and cost-effective means of reaching potential claimants.

No other claims administrator provides the full scope of in-house services that Heffler offers. Some of the value-added services we provide clients include:

- Class Notification
- Escrow Fund Services
- QSF & Fair Funds
- Auditing Services
- Tax Compliance Services
- Tax return preparation
- Form 1099 preparation and issuance
- Business Valuations
- Forensic Accounting
- Qui Tam Investigations
- Analysis and evaluation of incurred losses of claimants



OUR DIFFERENTIATORS

At Heffler, our priority is to get it right for our clients and to deliver results. A question we constantly ask ourselves is, "how can we be better?" It's this philosophy that drives our business model and is the reason for our distinctive, consultative approach to each case. As a trusted leader in class action administration, our team of professionals has more than 45 years' experience in managing and administering the claims process in many complex and sophisticated class actions. Our expertise allows us to provide you with proven and tried solutions that ultimately save you time and money.

WHY PARTNER WITH HEFFLER CLAIMS GROUP?

➤ HEFFLER GETS IT RIGHT

Drawing on almost five decades of experience, Heffler maintains its status as an industry leader by continually evaluating and refining our technologies, processes and procedures to ensure we provide our clients with the most efficient and cost-effective services possible. Counsel and courts have praised Heffler's mastery of the administration process. We are the longest standing claims administrator for a reason – excellence endures.

➤ WORLD-CLASS LEADERSHIP TEAM

Our team of former class action attorneys, CPAs, Forensic CPAs, MBAs, and IT experts are among the most experienced in the industry. We have the unique ability to provide you with the consultation needed for optimal solutions. By choosing Heffler, you can feel confident that CPAs will be working on your case to ensure the administration, distribution, audit and tax work are accurate.

➤ ADVANCED NOTICE/MEDIA SERVICES

Our in-house media affiliate, HF Media LLC, is comprised of experts who provide media, market and consumer research, media planning, graphic design, broadcast production, media buying, program evaluation and reporting and expert testimony. We consult with our clients to provide notice strategy and evaluate media options to determine the most impactful and cost-effective means of reaching potential claimants.

➤ ENTERPRISE CALL CENTER

Our in-house call center has the capacity to handle the specific needs of any case. Our ability to quickly scale to size allows us to handle call volumes ranging from five to 10,000 per day. Depending on the case requirements, we can provide professionally trained live agents or a cost-effective, 24/7 interactive voice response (IVR) service. Our call center can also be structured to provide single language or multi-lingual support with toll-free telephone numbers in one country or many countries simultaneously.



➤ **LEADING TECHNOLOGY**

Our advanced technology platform consists of sophisticated hardware and a suite of proprietary software modules custom-configured to meet the unique requirements of each case. Our exclusive software includes such features as electronic data capture, auto-adjudication of claims, correspondence tracking, claims analysis and data analysis and reporting. Additionally, our in-house, state-of-the-art scanning operation allows us to handle tens of thousands of claims per day and enables us to securely store electronic copies of all claims in case specific databases.

➤ **DATA SECURITY STANDARDS**

Leveraging the same technology as the World's largest banks, Heffler's security policies, procedures, and systems are designed to meet stringent industry standards, mitigate our clients' risk, and comply with the security, availability, processing integrity, confidentiality, and privacy principles embodied in the AICPA's Trust Services Principles, Criteria, and Illustrations' guide. Additionally, our controls are assessed during an annual SSAE 16 review by an independent audit firm which attests to the adequacy of the design of the control environment.



EXPERTISE & SERVICES

Our experienced legal, financial, technology and operations professionals are available to provide you with complete administration services for all manner of mass tort and class action matters. Heffler is unmatched in expertise and resources. We utilize unique systems and procedures that allow us to deliver top-quality results in an efficient and cost-effective manner. Our best practices have been developed through the administration of more than 900 cases, including some of the largest and most complex class actions of all time.

NOTICE/MEDIA CAMPAIGNS

- Design, print and mail Notices and Claim Forms
- Research, design, implement, evaluate and report on notice programs
- Media and consumer research
- Domestic and International media campaigns planned and implemented
- Integration of web, mobile and social media

WEBSITE & DATABASE DEVELOPMENT & INTEGRATION

- Custom web application design & development
- Comprehensive data privacy & security
- Design and analyze database systems
- Powerful analytics & reporting
- Efficient usability studies
- Enhanced quality control methods
- Post all necessary court documents and FAQs

TECHNOLOGY SERVICES

- Data architecting, integration, and management
- Data conversions and migrations
- Data consistency and integrity verification
- Extensive performance, load, and stress testing & tuning
- Design and execute complex claims processing applications
- Design and initiate notification applications
- Scanning & Optical Character Recognition (OCR)
- Reliable web hosting and design and initiate electronic claim filing process



ENTERPRISE CALL CENTER SERVICE

- Single language and multi-lingual support
- 24/7 toll free global telephone service
- Skilled live agents
- Automated, interactive voice response (IVR)
- Voice over Internet Protocol (VoIP) and SIP trunking
- Custom call tree design for FAQs

CLAIMS PROCESSING

- Develop plans of allocation
- Verify data
- Document claims
- Maintain claimant data
- Calculate claim amounts under Plans of Allocation
- Validate claims and recognized claim amounts

SETTLEMENT DISTRIBUTION

- Verify claims and distribution amounts
- Prepare and distribute settlement checks
- Reconcile distribution amounts
- Monitor and report on distribution & check status
- Prepare final reports
- Investor support services
- Set-up FDIC insured escrow and distribution accounts

ESCROW SERVICES

- Interface with financial institutions
- Monitor funds
- Ensure compliance with tax laws, rules & regulations
- Assist with structuring settlements

TAX COMPLIANCE & ADMINISTRATION OF QUALIFIED SETTLEMENT FUNDS & FAIR FUNDS

- Tax compliance and administration of QSFs & Fair Funds
- Consult on structuring of settlement agreements
- Provide representation before taxing authorities
- Negotiate penalties & interest, if any penalties or interest are assessed



QUALITY CONTROL PROVISIONS

At Heffler an experienced partner, manager and senior staff member are assigned to all new cases. This team of professionals works with you every step of the way to ensure consistency and accuracy throughout the duration of the case. Our partners and managers combined have well over 185 years of experience in class action administration. This core team ensures all the Policies, Procedures and Controls of Heffler are followed and confirms compliance with terms of the settlement agreement, the Notice and other legal document terms and conditions throughout the administration process.

Heffler maintains a proprietary "Policies, Procedures and Controls" document (the "PP&C") that is continually refreshed. The PP&C was provided to auditors in a recent SSAE 16 audit, which included a clean opinion.

Our PP&C document – approximately 100 pages in length – describes the controls and procedures we use in the areas of claims administration listed below. A control example is also provided for each category:

METHODS OF QUALITY ASSURANCE SURVEILLANCE

Heffler employs a quality assurance method designed to establish controls over the accuracy of claims data. We employ these built-in procedures during the administration process and prior to issuing a final report to verify the accuracy of Recognized Claim amounts, the implementation of Plans of Allocation, and the validity of remaining Deficient and Rejected claims.

During the course of the claims administration process, we conduct a review of claims in which both the work of the claims analyst and the details of the claims are examined for any deficiencies or rejection coding. We also review calculations of the Recognized Claim Amounts under the Plan of Allocation for accuracy.

For all types of cases, Heffler generates Quality Assurance Reports wherein certain claims are identified for further review as possible duplicate claims and claims filed by suspected or known fraud claim filers. Also, our supervisory staff conducts manual reviews for the largest claim groups for assurance of the validity of the claims. In all cases Heffler administers, we keep a detailed procedure log as part of our quality assurance process. This provides a document of procedures utilized during the course of the Notice and claims administration processes.



DATA SECURITY AND CONTROLS

Understanding that claimants typically provide personal and confidential information when filing claims, Heffler takes data privacy and security very seriously. Numerous physical and logical security controls are built into our infrastructure and applications allowing very granular, role-based security to be established, enforced and monitored. Examples include:

- Building access is monitored and controlled by building personnel. Permanent residents receive a photo ID for identification and to activate elevators after normal business hours. Visitors must sign in and receive a photo ID badge when they enter our building. The Company's receptionist is notified via e-mail from the lobby security that a visitor is on their way to our office. Visitors must sign in when they reach our reception area, are escorted to the office of the person they are visiting, and are signed out with the Receptionist when they depart. All entry doors to our office, with the exception of the reception area, are locked with key locks; the reception area is also locked after regular business hours.
- Server Room access is monitored and controlled by IT personnel. Key distribution is limited to IT operations and supervisory personnel only. Authorized personnel accompany all visitors. Activity is monitored by cameras.
- Application access is monitored and controlled using role-based functional security and activity logs. Access and functional controls are very granular, and each must be pre-authorized on a case-by-case basis by the Partner-in-charge of each case.
- Computing and storage devices require pre-authorized role-based credentials for user access, and are protected from viruses and malware using endpoint security software. Internet access is secured and monitored using firewalls, security appliances, and endpoint security software. All laptops are encrypted and USB ports on workstations are blocked.
- Data is also encrypted (using AES 256 encryption software) during transmission, and sensitive data is encrypted at rest in the database. Case-specific web sites designed to gather claimant data are secured via HTTPS technology, supplemented with security certificates as required by the case.
- All data is encrypted prior to being backed up to tape and stored in a secure third-party off-site location. Secure tape transport between locations is provided by the storage vendor. Retired media (including hard drives) are destroyed by a certified third-party company, with destruction certifications provided as required.
- The claims processing area is highly secured with key entry access.
- Paper case files are secured in locked file rooms or cabinets, accessible by pre-authorized individuals only.



FRAUD PREVENTION

Because computers, software, and technology are now more advanced and readily available, the filing of fraudulent claims and/or the creation of fraudulent distribution checks in class action settlements is more common and sophisticated than ever before. We overhauled our anti-fraud prevention measures over the past 10 years and have a comprehensive plan in place that allows us to detect fraudulent claims and prevent the cashing of fraudulent distribution checks. Heffler has stayed ahead of the curve with recent technology advancements and as a result, we believe our security processes and procedures excel in combating potential fraud.

In addition to communicating with all appropriate government agencies, such as the Federal Bureau of Investigation, the Internal Revenue Service, the U.S. Postal Service, and other claims administrators, a Partner is assigned to review certain types of claims filed in each case. The Partner's review includes the following:

1. Examining documents submitted for form set up and consistency with other claimants submitting the same type of documents.
2. Checking the existence and/or identity as well as the legitimacy of claimants.
3. Analysis of dates, prices and claims submitted by all claimants to detect certain patterns that may require additional follow up with the claimants.
4. Analysis of city, state and zip codes listed by all claimants to detect unusual area or location claim filing patterns.
5. Comparison of all claimants' names and addresses to our database of previously noted fraudulent filers or potential fraudulent filers.
6. Query of the database for addresses shown with prison cell/unit notations and those claims are reviewed with greater scrutiny.

POSITIVE PAY DISBURSEMENTS

We require all disbursing banks to activate their "Payee Verification Positive Pay Disbursement" services for each distribution. This service safeguards against non-approved issuance of distribution checks and fraudulently altered distribution checks. To further protect an account against fraud, the disbursing bank electronically images all checks, allowing Heffler to track a check immediately should there be a questionable check presented for payment.



HIRING & BACKGROUND CHECKS

Internally, all employees and potential employees have been subjected to a background check by a full service, pre-employment screening, testing and verification company. This background check includes a review of the following: credit history, driving record, criminal and civil records, felony and misdemeanor and deferred adjudication records, education and other public record information.

Heffler Claims Group
1515 Market Street, Suite 1700
Philadelphia, PA 19102

California | New Jersey | New York | Oklahoma | Oregon



Call Center Experience

Heffler Claims Group (Heffler) is the pioneering administrator in the class action field, with over forty years' experience in the management and administration of some of the most complex settlements in the country. Our in-house call center, managed by an experienced call center professional, uses state-of-the-art technology and proven processes to ensure we are making the most profitable connection with claimants on a 24/7 basis. Our world-class team is comprised of JDs, CPAs, forensic CPAs and MBAs who have decades of practical experience. This unique blend of in-house expertise allows us to efficiently scale for all case types regardless of size or scope. Our expertise allows us to provide proven solutions that save time and money.

Heffler Gets it Right



CAPACITY TO HANDLE SPECIFIC NEEDS

We have the capacity to handle the specific needs of any case or project. We can quickly scale to handle call volume specific to any endeavor.



PROFESSIONALLY TRAINED LIVE AGENTS

We uphold the highest standard of professional communication to ensure accuracy, completeness and empathy in all of our interactions. We turn raw data into customer-friendly real-time information. Our agents are seasoned, professionally trained, and managed by an experienced call center manager. Live agents are also available any hours to satisfy client needs.



IVR SERVICE

Using our 24/7, toll-free Interactive Voice Response (IVR) service, we are able to constantly inform callers of important dates and answer FAQs, as well as streamline call volume. The IVR reporting capabilities allow for daily, weekly or monthly reporting based on the needs of the client.



SINGLE OR MULTI-LINGUAL SUPPORT

Our call center can be structured to provide single or multi-lingual support with toll-free telephone numbers in one country or many countries simultaneously.



CLIENT COMMUNICATION

We realize that the key to success is communication among parties involved. We keep clients involved in the process and make sure we refine scripts as needed to maximize efficiency in handling inbound and outbound calling. When our agents receive questions that may not be included in an original script, Heffler consults with appropriate parties to determine the best answer. Recognizing the ever-changing business landscape, scripts may be redeveloped to ensure ongoing completeness and correctness.



ACCURATE CASE TRACKING

Reports and call tracking are designed to meet the unique requirements of each client Heffler works with clients to develop the most accurate and profit-driven reporting in the industry. All inbound and outbound calls are recorded for quality assurance and to provide clients with real time review capability to ensure project success and accuracy.



QUALITY ASSURANCE

Our number one priority is 100% customer satisfaction. Heffler is constantly enhancing our methods to ensure that all calls are handled in the most accurate, complete, and professional manner possible. We review daily statistics, including hold time, talk time and abandoned call rate to ensure that each case is completed to the highest level of performance.

Exhibit B

Exhibit B

NFL Concussion Settlement IVR Message until July 17, 2014.

"This toll free number is for information relating to the NFL Concussion Settlement. We expect to have a full range of information and options available by July 17, 2014. In the meantime please feel free to visit www.nflconcussionsettlement.com. That's: www. N-F-L-C-O-N-C-U-S-S-I-O-N-S-E-T-T-L-E-M-E-N-T. com. Thank you."

Exhibit C

Exhibit C

Introduction

Voice: Welcome to the 'NFL Concussion Settlement' Voice Information System. This system uses a "Frequently Asked Questions" format to briefly describe the proposed class action Settlement involving all retired players from the NFL, AFL, World League of American Football, NFL Europe League, or NFL Europa League. If you were retired as of July 7, 2014 - you, or an authorized legal representative for legally incapacitated or deceased players, and family members of retired players who meet certain criteria can file a claim.

If you fit this description, continue to listen to a summary of the Settlement and how your rights will be affected and the important dates and deadlines you need to remember. At the end of your call, if you need more information, visit www.NFLConcussionSettlement.com. That's: "w-w-w dot N-F-L-C-O-N-C-U-S-S-I-O-N-S-E-T-T-L-E-M-E-N-T dot C-O-M." On the website you will find the detailed class notice, a list of Frequently Asked Questions, and the Settlement Agreement. There are important deadlines to follow so please be sure to read the detailed Notice and the Settlement Agreement. If you prefer to ask questions in writing, you can write to the Claims Administrator at: NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260. As a reminder, please do not contact the court with any questions.

Main Menu (Voiced)

To speak to a live operator at any time during your call please press 0. Please be advised that live operators are available from 8am until 8pm EST. If you are calling at a time when a live agent is not available feel free to leave a voice message that includes: your first and last name, return call number - including area code, the best time to reach you and a brief message. A live agent will return will return your call within 24 hours or during the time specified.

For "How can I register for the Settlement, see the full notice or a copy of the Settlement Agreement?" Press '1'

For "Why should I read the Notice?" Press '2'

For "What is the Litigation about Press '3'

For "Why is there a Settlement?" Press '4'

For "Who is included in the settlement or Settlement Class?" Press '5'

For "What does the settlement provide?" Press '6'

For "Who represents the Settlement Class?" Press '7'

For "How can I exclude myself or opt-out of the Settlement Class?" Press '8'

For "How can I tell the Court what I think about the settlement?" Press '9'

For Additional Frequently Asked Questions Press #

Additional FAQ's (Voiced)

For "What is the effect of final settlement approval?" Press '1'

For "When and where will the Court hold a hearing on the fairness of the settlement?" Press '2'

For "How and when do I receive my benefits?" Press '3'

For "What happens if I do nothing at all?" Press '4'

For "Where do I get additional information?" Press '5'

1. How can I register for the Settlement, see the Long Form notice or a copy of the Settlement Agreement? (Voiced)

To receive any benefits under the Settlement, you have to register. But you can only register after the Settlement has been approved by the Court, and all appeals have been resolved. After that time, a notice will be made, including through the official website about when and how to register for the Settlement Benefits. At the official website, www.nflconcussionsettlement.com, you can also sign-up to ensure that you receive future information about the Settlement, including the Registration Period. You can also speak to a live agent to leave your contact information to receive future information about the Settlement.

The Full Notice and Settlement Agreement provide detailed information about what the Settlement provides, your rights, and important deadlines you need to know about. Visit www.nflconcussionsettlement.com. You may also request these documents by speaking to a live agent or by writing to: NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

2. Why should I read the Long Form Notice? (Voiced)

The Long Form Notice provides additional information about the proposed Settlement of this lawsuit. It also describes how your rights may be affected and what options you have - along with important dates and deadlines. It's important for you to know that this Settlement may affect your rights if you are: ...a retired player of the NFL, AFL, World League of American Football, NFL Europe League, or NFL Europa League, ...an authorized representative of a deceased or legally incapacitated or incompetent retired player of those leagues, or ...an individual with a close legal relationship with a retired player of those leagues, such as a spouse, parent or child. Please read the notice carefully so you can decide if you wish to participate in the Settlement.

The Full Notice is available at www.nflconcussionsettlement.com. You may also request these documents by speaking to a live agent or by writing to: NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

3. What is the Litigation about? (Voiced)

The people who sued, called Plaintiffs, claim that retired players experienced head trauma during their NFL football playing careers that resulted in brain injuries. They claim that those injuries caused or may cause long-term neurological problems. The Plaintiffs also say that the NFL Defendants knew about the risks of associated with repetitive traumatic brain injuries but failed to warn and concealed the information from the players. The NFL Defendants deny the claims and allegations in the litigation.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

4. Why is there a settlement? (Voiced)

After extensive settlement negotiations mediated by a retired United States District Court Judge and a court-appointed Special Master, the Plaintiffs and the NFL Parties agreed to the Settlement.

A settlement is an agreement between a plaintiff and a defendant to resolve a lawsuit. Settlements conclude litigation without the court or a jury ruling in favor of the plaintiff or the defendant. A settlement allows the parties to avoid the cost and risk of a trial, as well as the delays of litigation.

If the Court approves this Settlement, litigation between the Settlement Class Members and the NFL Parties are over. Only Settlement Class Members are eligible for benefits and the NFL Parties will no longer be legally responsible to defend against the claims made in this litigation.

The Court has not and will not decide in favor of the retired players or the NFL Parties. By reviewing this Settlement the Court is not making and will not make any findings that any law was broken or that the NFL Parties did anything wrong.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

5. Who is included in the Settlement Class? (Voiced)

This Settlement Class includes three types of people or "Settlement Class Members:"

- 1) **Retired Players** - You are included in the Settlement if you're a retired player before July 7th 2014 from the NFL or any Member Club, including the AFL, World League of American Football, NFL Europe League, or NFL Europa League or were formally on any roster of any Member Club but are no longer under contract and are not seeking active employment as a player with any Member Club.
- 2) **Representative Claimants**: If you're an authorized representative, as ordered by a court, of a player that is legally incapacitated, incompetent or deceased you are included in the Settlement.
- 3) **Derivative Claimants**: If you are a spouse, parent, dependent child, or any other person who

under applicable state law has the right to sue independently or derivatively by reason of your relationship with a living or deceased Retired NFL Football Player, then you are a "Derivative Claimant" and you are included in the Settlement.

The Settlement also recognizes two separate groups ("Subclasses") of Settlement Class Members:

- Subclass 1 includes: **Retired NFL Football Players** who were **not** diagnosed with ALS, Alzheimer's Disease, Parkinson's Disease, Level 2 Neurocognitive Impairment (moderate Dementia), Level 1.5 Neurocognitive Impairment (early Dementia) or Death with CTE prior to July 7, 2014, and their Representative Claimants and Derivative Claimants.
- Subclass 2 includes:
 - (a) Retired NFL Football Players who were diagnosed with ALS, Alzheimer's Disease, Parkinson's Disease, Level 2 Neurocognitive Impairment (moderate Dementia), Level 1.5 Neurocognitive Impairment (early Dementia), prior to July 7, 2014, and their Representative Claimants and Derivative Claimants; and
 - (b) Representative Claimants of deceased Retired NFL Football Players who were diagnosed with ALS, Alzheimer's Disease, Parkinson's Disease, Level 2 Neurocognitive Impairment (moderate Dementia), or Level 1.5 Neurocognitive Impairment (early Dementia) prior to death or who died prior to July 7, 2014 and afterward received a diagnosis of Death with CTE.

You are **not** a member of the Settlement class if you are a current NFL player or if you tried out for NFL or AFL Member Clubs, or World League of American Football, NFL Europe League or NFL Europa League teams, but **did not make it** onto preseason, regular season or postseason rosters, or practice squads, developmental squads or taxi squads.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

6. What benefits are available under the settlement after it is approved and appeals have been resolved? (Voiced)

The settlement provides three basic benefits:

Baseline neuropsychological and neurological examinations for eligible retired players, and additional medical testing, counseling and/or treatment if they are diagnosed with moderate cognitive impairment during the baseline examinations;

Monetary awards for diagnoses of ALS, Parkinson's Disease, Alzheimer's Disease, Level 2 Neurocognitive Impairment (*i.e.*, moderate Dementia), Level 1.5 Neurocognitive Impairment (*i.e.*, early Dementia) and Death with CTE prior to July 7, 2014 (all valid claims throughout the 65 year term of the Settlement will be paid in full); and

Education programs promoting safety and injury prevention with respect to football players, including safety-related initiatives in youth football, the education of retired players regarding the NFL's medical and disability programs and other educational programs and initiatives.

Monetary awards for qualifying diagnoses will also depend on certain facts about the retired player, including his age at the time he was first diagnosed, the number of seasons he played or practiced, and whether he has been diagnosed with a stroke or traumatic brain injury prior to the Qualifying Diagnosis. The funds you receive may also depend on whether the retired player participated in the baseline neuropsychological and neurological exams made available under the Settlement, and whether there are any legally enforceable liens on your award. A detailed chart listing the awards and explanations of the diagnoses and any adjustments to the awards are found in the Long Form Notice and the Settlement Agreement posted on the website www.nflconcussionsettlement.com.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

7. Who represents the Settlement Class? (Voiced)

For purposes of the settlement, the Court has appointed Shawn Wooden and Kevin Turner as the representatives of the Settlement Class.

The Court has appointed Christopher Seeger of the law firm Seeger, Weiss LLP, and Sol Weiss of the law firm Anapol Schwartz as attorneys working as Co-Lead Class Counsel; Steven Marks of the law firm Podhurst Orseck and Gene Locks of the Locks Law Firm as Class Counsel, and Arnold Levin of the law firm Levin, Fishbein, Sedran and Berman for as Counsel Subclass 1 and Dianne Nast of Nast Law LLC as Counsel for Subclass 2.

You will not be charged for contacting any of these law firms. If you are already represented by an attorney, you may contact your attorney to discuss the proposed settlement.

If you want to be represented by your own lawyer, you may hire one at your own expense.

At a later date to be determined by the Court, Co-Lead Class Counsel, Class Counsel and Subclass Counsel will ask the Court for an award of class attorneys' fees and reasonable costs. The NFL Parties have agreed not to oppose or object to the request for attorney's fees and reasonable incurred costs if the request does not exceed \$112.5 million. These fees and incurred costs will be paid separately by the NFL Parties and not from the Baseline Assessment Program Fund, Education Fund or Monetary Award Fund. Settlement Class Members will have an opportunity to comment on and/or object to this request at an appropriate time. Ultimately, the award of attorneys' fees and reasonable costs to be paid by the NFL Parties is subject to the approval of the Court.

After Final Settlement Approval, Co-Lead Class Counsel may ask the Court to set aside up to five percent of each monetary award and derivative claimant award to facilitate the Settlement program and related efforts of Co-Lead Class Counsel, Class Counsel and Subclass Counsel. If approved, this money would be held in a separate fund overseen by the Court. Any future request for a set-aside will describe: (1) the proposed amount; (2) how the money will be used; and (3) any other relevant information. This "set-

aside" would come out of the claimant's attorney's fee if represented by individual counsel or, if not represented, out of the monetary award and derivative claimant award itself. No money will be held back or set aside from any award without a Court order. The set-aside is a matter between Class Counsel and individual counsel for Settlement Class Members. The NFL Parties do not take a position on the proposal.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

8. How can I exclude myself or opt out of the Settlement Class? (Voiced)

If you want to retain the right to sue the NFL Parties about the legal issues in this case, then you must take steps to remove yourself from the Settlement. You may do this by asking to be excluded from or opt out of the Settlement Class.

To exclude yourself from the Settlement, you must mail a letter or other written document to the Claims Administrator saying that you want to be excluded from the class in the NFL Concussion Litigation. Your written exclusion request must include your name, address, telephone number and date of birth. Also, you need to include a copy of your driver's license or other government issued identification and signature, along with a clear statement saying: "I wish to exclude myself from the Settlement Class in *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323." Include your hand written signature (not an electronic signature), and the date on which you signed it (even if represented by an attorney).

- You must mail your exclusion request, postmarked no later than **October 14, 2014**, to NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260.

If you elect to opt-out, you will not be able to submit a claim to receive any monetary payment,you will not be bound by any further orders or judgments in this case, andyou will be able pursue claims alleged in the Litigation against the NFL by filing your own lawsuit at your own expense. If you proceed on an individual basis, you may receive nothing at all, or more, or less, of a benefit than you would otherwise receive under this settlement.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

9. How can I tell the Court what I think about the settlement? (Voiced)

If you do NOT exclude yourself from the Settlement Class, you can object to the Settlement or any part of it. The Court will consider your views. To object to the Settlement, you or your attorney must submit your written objection to the Court. The objection should include the following:

- The name of the case and multi-district litigation, *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323;
- Your name, address, telephone number, and date of birth;
- If you are a Representative Claimant or Derivative Claimant, the name of the Retired NFL Football Player to whom you are related;
- Written evidence establishing that you are a Settlement Class Member;

- A detailed statement of your objections, and the specific reasons for each such objection, including any facts or law you wish to bring to the Court's attention;
- Any other supporting papers, materials or briefs that you want the Court to consider in support of your objection; and
- Your signature by hand (not any form of electronic signature), and the date on which you signed it (even if represented by an attorney).

You can find all the requirements to object to the Settlement in the Settlement Agreement – section 14.3. This document is found on the website www.NFLConcussionSettlement.com. You must file your objection with the Court no later than **October 14, 2014**. Your objection should be mailed to:

Clerk of the Court/NFL Concussion Settlement
U. S. District Court for the Eastern District of Pennsylvania
United States Courthouse
601 Market Street,
Philadelphia, PA 19106-1797

In addition, if you would like to speak at the final approval hearing (the "Fairness Hearing"), you may ask the Court for permission to speak. The Court will determine whether to grant you permission to speak. To make such a request, you must send written notice of your intent by November 3, 2014. Include a statement that you would like to speak at the In re: National Football League Players' Concussion Injury Litigation, No. 2:12-md-02323 Fairness Hearing, along with your name, address, telephone number, and your signature. Your request should be mailed to that same address:

Clerk of the Court/NFL Concussion Settlement
U. S. District Court for the Eastern District of Pennsylvania
United States Courthouse
601 Market Street
Philadelphia, PA 19106-1797

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

1. What is the effect of final settlement approval? (Voiced)

If the Settlement is approved by the Court and becomes final, unless you exclude yourself from

the Settlement Class, all of the decisions by the Court will bind you even if you do not receive any benefits from the Settlement. You will be giving up your claims about the issues in *In re: National Football League Players' Concussion Injury Litigation* against the NFL Parties, the Member Clubs, and certain other individuals and entities with a relationship to the NFL Parties and Member Clubs, and promising not to sue those parties in the future about those issues too.

You are giving up your right to continue to litigate those claims, or file new such claims, in any court or in any proceeding at any time. **However, the Settlement does not release any claims for workers' compensation or claims alleging entitlement to NFL medical and disability benefits available under the Collective Bargaining Agreement.**

Please note that certain Plaintiffs also sued the football helmet manufacturer Riddell and certain related entities (specifically, Riddell, Inc., Riddell Sports Group Inc., All American Sports Corporation, Easton-Bell Sports, Inc., EB Sports Corp., Easton-Bell Sports, LLC, and RBG Holdings Corp.), **but they are not parties to this Settlement and claims against them are not released by this Settlement.**

Article 18 of the Settlement Agreement contains the complete text and details of releases and covenants not to sue, so please read it carefully. The Settlement Agreement is available at www.NFLConcussionSettlement.com. If you have any questions you can talk to the law firms for free or you can talk to your own lawyer if you have questions about what this means.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

2. When and where will the Court hold a hearing on the fairness of the settlement? (Voiced)

The Court will hold the Fairness Hearing at 10:00 a.m. on **November 19, 2014**, at the United States District Courthouse for the Eastern District of Pennsylvania, located at the James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, PA 19106-1797, in Courtroom 7B. You may attend and you may ask to speak, but you do not have to. The Court will determine if you are allowed to speak if you request to do so.

At the hearing, the Court will hear any comments, objections, and arguments concerning the fairness of the proposed settlement.. You do not need to attend the Fairness Hearing to remain a class member or obtain a settlement payment.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

3. How and when do I receive my share of the settlement? (Voiced)

To get benefits, you will need to register. However, you cannot register until a later date, after this Settlement is approved by the Court at the Fairness Hearing, and any appeals are fully resolved. At that later time, there will be another notice, including at the settlement website (www.NFLConcussionSettlement.com), about when and how to register for Settlement benefits. Registration will need to be completed in the time permitted if you wish to receive any of the benefits provided through this Settlement. At the official website, www.nflconcussionsettlement.com, you can also sign-up to ensure that you receive future information about the Settlement, including the Registration Period. You can also speak to a live agent to leave your contact information to receive future information about the Settlement.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

4. What happens if I do nothing at all? (Voiced)

You don't need to do anything now. But remember, if you will ever want to receive money under the Settlement you will eventually need to register to file a claim – registration will start after the Court Approves the Settlement.

However, if you choose not to register after the Court approves the Settlement, you will NEVER BE ABLE TO receive a payment from the settlement. You will still be part of the Settlement Class, however, and, give up certain rights as part of the Settlement Agreement. Please carefully read the Settlement Agreement for a full description of the claims and persons that will be released upon final approval of the settlement.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

5. Where do I get additional information? (Voiced)

The telephone message provides only a summary of the matters relating to the settlement. For more detailed information, please review the Settlement Agreement. Visit www.NFLConcussionSettlement.com to get a copy of the Settlement Agreement and a detailed notice. Or, you can mail questions to NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260.

AS A REMINDER, PLEASE DO NOT CONTACT THE COURT OR THE NFL WITH QUESTIONS ABOUT THE SETTLEMENT.

You may hang up, press 0 to speak to a live agent or press "*" to return to the main menu.

**33. Do I have a lawyer in the case? (References Question #7 from IVR Main Menu)
(Replaces question #7 (this change was made on September 9, 2014))**

The Court has appointed a number of lawyers to represent all Settlement Class Members as "Co-Lead Class Counsel," "Class Counsel" and "Subclass Counsel." They are:

Christopher A. Seeger
Co-Lead Class Counsel
SEGER WEISS LLP
77 Water Street
New York, NY 10005
Steven C. Marks
Class Counsel
PODHURST ORSECK P.A.
City National Bank Building
25 W. Flagler Street, Suite 800
Miami, FL 33130-1780
Arnold Levin
Counsel - Subclass 1
LEVIN FISHBEIN SEDRAN &
BERMAN
510 Walnut Street, Suite 500
Philadelphia, PA 19106

Sol Weiss
Co-Lead Class Counsel
ANAPOL SCHWARTZ
1710 Spruce Street
Philadelphia, PA 19103
Gene Locks
Class Counsel
LOCKS LAW FIRM
The Curtis Center, Suite 720 East
601 Walnut Street
Philadelphia, PA 19106
Dianne M. Nast
Counsel - Subclass 2
NAST LAW LLC
1101 Market Street, Suite 2801
Philadelphia, Pennsylvania 19107

You will not be charged for contacting these lawyers. If you are represented by your own attorney, you should contact that attorney to discuss the proposed Settlement. You do not have to hire your own attorney to participate in the Settlement program, but the administrators of the program cannot provide you with any legal advice or answer questions that depend upon your individual factual circumstances. If you do not already have your own attorney, you may hire one at your own expense.